

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

*In Re Kobalt Music Publishing America, Inc.  
Coordinated Copyright Cases*

*This filing relates to:*

All Coordinated Cases

24-cv-05454 (ER) (BCM)  
24-cv-05455 (JAV) (BCM)  
24-cv-05456 (AKH)(BCM)  
24-cv-05457 (JGK) (BCM)  
24-cv-05458 (VM) (BCM)  
24-cv-05459 (JAV) (BCM)  
24-cv-05460 (LJL) (BCM)  
24-cv-05462 (GHW)(BCM)  
24-cv-05463 (JLR) (BCM)  
24-cv-05465 (GHW)(BCM)  
24-cv-05466 (JHR) (BCM)

**CERTIFICATE OF SERVICE**

Undersigned counsel hereby certifies that on this 5th day of March, 2025, Defendants served copies of their March 3, 2025 Letter Motion to Seal by email on the parties and non-party listed below. A copy of Defendants' notification email, which is attached hereto, notified non-party TuneSat LLC that "it must file, within three court days, a letter explaining the need to seal the materials at issue (see Moses Ind. Prac. § 3(f))." Defendants attached a copy of the exhibit they seek to seal to their March 5, 2025 notification email.

Parties and non-party served:

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Dated: New York, New York  
March 5, 2025

Respectfully submitted,



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**Subject:** In Re Kobalt Music Publishing America, Inc. Coordinated Copyright Cases  
**Date:** Wednesday, March 5, 2025 8:39:00 AM  
**Attachments:** [3.3.25 Letter to J. Moses.pdf](#)  
[Proposed Sealed Document.pdf](#)

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Rob:

On Monday, March 3, I filed with Judge Moses the attached letter motion to seal the excerpts of Chris Woods' deposition transcript that defendants intend to attach as an exhibit to their anticipated motion to compel the production of documents from TuneSat. Also attached to this email are the excerpts we intended to attach to our motion.

Yesterday afternoon, March 4, Judge Moses directed defendants "to promptly notify TuneSat that it must file, within three court days, a letter explaining the need to seal the materials at issue (see Moses Ind. Prac. § 3(f)), and file proof of service of that notice on the docket." I will file the required notice later today.

Please let me know if you have questions or would like to discuss.

Thanks,

David